

- 7 -

REMARKS

This is in response to the Final Office Action mailed on January 24, 2007. Claims 1-24 were pending in the application, and the Examiner rejected all claims. With this amendment, claims 1, 3, 5-7, and 12-13 are amended, claim 2 is canceled, and the remaining claims are unchanged in the application.

On page 2 of the Office Action, the Examiner rejected claims 1, 12 and 19 under 35 U.S.C. §112, second paragraph as being indistinct. Based on this rejection, Applicant respectfully requests that the Examiner withdraw the finality of the rejection. The Examiner questioned Applicant's use of, among others, the following terms "organization structure information", "an organization structure", "data entities", "data and/or information that is representative of the data entity". Each and every one of these terms was already in the claims, prior to the first Office Action. None of the Examiner's objections were raised until the Examiner issued the present Final Office Action.

Applicant respectfully submits that this puts Applicant at an unfair disadvantage. The Examiner could easily have raised these issues in the first Office Action and given Applicant an opportunity to amend the claims, if necessary, to obviate any issues with respect to §112 claim formalities. Applicant is only now left with one chance to attempt to resolve these issues, since the case is now after final. Thus, Applicant respectfully requests that the Examiner withdraw finality of the Office Action

In any case, claim 1 has been amended to read "obtaining organization structure information that defines a hierarchical organization structure of connected nodes". Therefore, Applicant submits that the term "organization structure information" is well defined. The term "functions performed" which was cited by the Examiner has been deleted from the claim. Claim 1 has also been amended to read "each node representing a business unit, each business unit being a part of the organization, the organization structure defining how the business units are related to each other based on how the nodes are connected to one another in the organization structure...". Therefore, Applicant submits that the use of the term "business units" is now clear.

- 8 -

Claim 1 has also been amended to state "obtaining data entity information that defines data entities that represent the business data related to the organization...". Therefore, Applicant submits that it is now clear what the data entities are and that the data is business data. Applicant thus submits that the claims are now in proper form.

On page 3 of the Office Action, the Examiner recited a list of questions regarding the step of controlling user access to the data entities based on the links. Claim 1 has now been amended to read "controlling whether the user has access to the data entities based on the links." Applicant thus submits that this step of claim 1 is clear and distinct.

On pages 3-5 of the Office Action, the Examiner rejected independent claims 1, 12 and 19 under 35 U.S.C. §101. Applicant respectfully traverses the Examiner's rejection. The Examiner is simply incorrect. The claims do set forth useful, concrete and tangible inventions. Claim 1 specifically claims obtaining organization structure information and data entity information and generating links between them, and then controlling whether a user has access to the data entities based on the links generated. The organization structure information is well defined in the claim, as is the data entity information, and the practical application of controlling whether a user has access to business data of an organization is certainly useful, concrete and tangible.

Similarly, claim 12 is an apparatus claim that includes two components. The first is a component that generates an organization structure, which is well defined as having a plurality of nodes that represent business units, each business unit being part of the organization. The second component is a link manager component that generates links between the given business units of the organization represented by the nodes in the organization structure and an entity representative of data corresponding to the organization. The apparatus set out in claim 1 is one which can be used to generate the data structure (links between the data and the organization structure). Of course, as described with respect to claim 1, this type of linked data structure is useful for, among other things, controlling user access to business data of the organization. Thus, it unquestionably claims a tangible, concrete and useful apparatus.

- 9 -

Finally, claim 19 not only claims the tree structure which is well defined as having connected nodes that represent functional business units of an organization and filter links that identify business data entities linked to the functional business units of the organization, but it also includes a function to use the tree data to control user access to the business data entities. The tree structure is stored on a computer readable medium, and the function explicitly states that it uses the tree data to perform the operation of controlling user access to business data. Applicant respectfully submits that the claim could hardly be more concrete, straight-forward, useful and tangible. Thus, Applicant respectfully requests that the Examiner reverse the rejection based on 35 U.S.C. §101.

On page 10 of the Office Action, the Examiner rejected claims 1-24 under 35 U.S.C. §102(e) as being anticipated by Gervais et al. US Patent No. 6,381,579. Applicant respectfully traverses the Examiner's rejection. The Gervais reference simply does not teach or suggest the elements of the claim.

Specifically, independent claim 1 states "obtaining organization structure information that defines a hierarchical organization structure of connected nodes, each node representing a business unit, each business unit being a part of the organization...". This element is missing from Gervais. The Examiner pointed to FIG. 1, column 6, lines 18-35, column 5, lines 50-67, column 6, lines 1-65, and columns 8 and 9. However, none of this shows any type of organization structure information that defines a hierarchical organization structure, much less a structure of connected nodes wherein each node represents a business unit, and each business unit is a part of the organization. The structure in FIG. 1 does not include nodes that represent business units, wherein the business units form part of the organization. Each of the nodes 104 in FIG. 1 are discussion databases. The first is a sales discussion database and the second is a product discussion database. While a sales department of an organization may be a business unit, a discussion about products certainly is not a business unit. It simply is not part of the organization as set out in claim 1.

-10-

Similarly, the references that the Examiner makes to FIG. 5 do not show any type of organization structure that defines a hierarchical organization structure of connected nodes. In fact, there do not appear to be any connected nodes, whatsoever, in FIG. 5.

FIGS. 7-12 which the Examiner cited show how resources can be created so that managers have read/write authority with respect to those resources, while users have read only authority with respect to the resources. However, there simply does not appear to be any type of "organization structure information that defines a hierarchical organization structure of connected nodes, each node representing a business unit, each business unit being a part of the organization...". This is simply missing from the citations provided by the Examiner.

Claim 1 goes on to state "the organization structure [defines] how the business units are related to each other based on how the nodes are connected to one another in the organization structure...". Of course, since Gervais et al. does not teach or suggest any organization structure as discussed above, it cannot teach or suggest that the organization structure defines how the business units are related to each other based on how the nodes are connected to one another in the organization structure. To illustrate this point, the Examiner is directed, by way of example only, to the organization structure 250 shown in FIG. 3 of the present application. It can be easily seen, for example, that division 260 and division 262 are divisions of company B1 245. Thus, simply the connection of the nodes in the organization structure 250 shows how the business units therein are related to one another. Another embodiment of this is shown at 614 in FIG. 8B. Of course, these are exemplary citations only.

Having neither taught nor discussed the organization structure of connected nodes, wherein the nodes represent business units, wherein each business unit is part of the organization, and having neither taught nor suggested that the organization structure defines how the business units are related to one another based on how they are connected to one another in the organization structure, Gervais et al. simply cannot teach or suggest "generating links, separate from the data entities, linking the data entities to the nodes in the organization structure...". There does not appear to be any type of linking of business data entities to business units, as represented by nodes in a hierarchical structure, in Gervais et al. None of the figures cited by the

- 11 -

Examiner, nor the associated text, teach or suggest this. Applicant thus submits that it is simply not found in Gervais et al.

Further, Applicant respectfully submits that Gervais et al. in fact teaches away from the present invention. The teachings in Gervais et al. indicate that it directly links data to users. Therefore, if the users of the data change, or if an organizational structure of an organization changes, the data objects, which include corresponding links to users, must be updated to reflect changes in user access to the data. Gervais specifically states "each entity in the system hierarchy of containers and resources has both a group of users and a group of managers. The user group has read access to the entity and the management has read/write authority to the entity." Column 9, lines 62-66. This is specifically accomplished by providing different fields within the data object that include the name of the users. For instance, Gervais specifically states "each document in Lotus Notes is allowed to have reader and author name fields. These fields determine who can read and edit the document, respectively. The fields can contain either individual user names or collections of users which are stored in group documents in the NAB. If a user's name does not appear in the reader names field, then that document will not appear to the user through a Lotus Notes domino web interface." See column 10, lines 6-13. Thus, it is clear that the data is directly linked to the users. This explicitly teaches away from the element in claim 1 of "generating links, separate from the data entities, linking the data entities to the nodes in the organization structure..." (emphasis added). Gervais does not link data to nodes in an organization structure. Instead, Gervais links data directly to users. This is in direct contrast to independent claim 1.

In sum, Gervais specifically fails to teach or suggest a number of the elements of independent claim 1. In fact, Gervais expressly teaches away from at least one of the elements of claim 1. Therefore, Applicant submits that Gervais cannot anticipate independent claim 1.

Independent claim 12 is directed to a system for relating data, corresponding to an organization, to an organization structure indicative of a structure of the organization. The system includes "an organization structure generator component, configured to generate the organization structure with a plurality of connected nodes, each node representing a business

- 12 -

unit, each business unit being part of the organization...". Gervais does not teach anything that can generate such an organization structure. Gervais et al. does not teach any organization structure with a plurality of connected nodes, wherein each node represents a business unit that is part of the organization itself. This is simply neither taught nor suggested by Gervais et al. Therefore, Gervais et al. cannot teach the organization structure generator component of claim 12.

Similarly, claim 12 includes "a link manager component configured to generate a link between a given business unit of the organization represented by a given node in the organization structure and an entity representative of business data corresponding to the organization by generating the link between the given node and the entity." Since Gervais et al. does not teach an organization structure generator component that can generate the structure discussed above, it simply cannot teach a link manager component that generates links to that structure. Clearly, then, it cannot teach a link manager that generates a link between a given business unit and an entity representative of business data corresponding to the organization "by generating the link between the given node and the entity." Therefore, Applicant submits that Gervais et al. cannot anticipate independent claim 12.

Finally, independent claim 19 is drawn to a data structure that includes tree data "indicative of a tree structure comprised of connected nodes, each node in the tree structure representing a functional business unit of the organization and configured to include filter links...". Gervais et al. simply does not teach or suggest any type of tree structure of connected nodes wherein the connected nodes represent functional business units of the organization, much less where those nodes include filter links. As discussed with respect to claim 1, the cited portions of Gervais do not teach this structure.

Claim 19 goes not to state that each of the filter links "identify a business data entity that is linked to the functional business unit of the organization represented by the node containing the link...". Again, Gervais et al. appears to specifically teach that the data are directly linked to the users, and not to nodes that represent business units in an organization

- 13 -

structure. Therefore, Gervais et al. appears to teach directly away from this limitation of claim 19.

Since Gervais et al. does contain these limitations of claim 19, it cannot teach or suggest a function that uses the tree data to control user access to the business data entities." Thus, Gervais et al. cannot teach the ultimate limitation of claim 19 either. Applicant thus submits that claim 19 is allowable over Gervais et al.

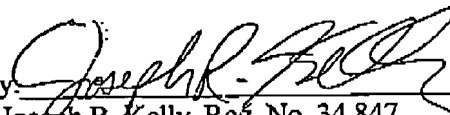
In conclusion, Applicant submits that the claims are allowable over the references cited by the Examiner. Therefore, Applicant respectfully requests reconsideration and allowance of claims 1 and 3-24. Alternatively, Applicant respectfully requests that the Examiner withdraw the finality of the present Office Action, since the Examiner made a number of new rejections, which should properly have been made in the first Office Action, thereby giving Applicant adequate time to respond to the rejections.

Applicant also requests acknowledgement that the previously submitted drawings have been accepted.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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